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Director
Commodity Procurement Policy &
Analysis Division
Farm Service Agency
United States Department of
Agriculture (USDA)
Room 5755-S
1400 Independence Avenue, SW
Washington, DC 20250-0512
Attention: Mr. Richard Chavez

Re: Notice at 70 *Fed. Reg.* 74717 (December 17, 2005), 7 CFR Part 1496,
Procurement of Commodities for Foreign Donation -- Proposed Rule

Dear Mr. Chavez.

We are writing on behalf of Sealift, Inc. of Oyster Bay, New York in response to the subject notice. Sealift owns and operates 11 US flag vessels at least three of which regularly trade in the carriage of cargoes sponsored by USDA / CCC under Title II and other programs governed by the subject rules. Sealift has a vital interest in the administration of these programs, and, in particular, the procedures to be used in a submission and evaluation of bids in connection with the procurement of commodities for donations overseas.

Sealift respectfully requests that the time to submit comments be enlarged from the current deadline of January 17, 2006.

Achievement of a one step bid process has been a long-term goal of CCC. The effort began more than five years ago but was set aside for lack of funds. The effort was revived when funds were made available for this purpose. The centerpiece of the project has been the software to be used for the submission and ranking of offers for commodities and ocean carriage. Because, however, the conceptual and programmatic systems to accomplish this goal remain work-in-progress at this writing, Sealift has some genuine concerns about whether the contemplated system can accommodate the commercial realities of the current bid system without restricting carriers' ability to craft responsive offers or burdening bid preparation and submission. In order to accomplish the savings sought by CCC, the system must offer commercial transparency for carriers to compete in an informed way. As the notice recognizes, the intention to "add clarity to the bid evaluation process," 70 *Fed. Reg.* 74717, is essential: a "lottery" type system -- whether intended or not -- will not provide any incentives for more competitive bidding. In our view, the starting point for clarity should be a specific side-by-side comparison of outcomes under the current system versus the proposed system. We understand that such a comparison is contemplated and we believe that it should provide an invaluable instruction for all as to the strengths or weaknesses of the system.

Accordingly, Sealift requests that the time for submission of comments be enlarged until such time as a side-by-side comparison of the current system versus the proposed system

can be run with the results made available to the industry. Alternatively, at a minimum, the comment period should be enlarged until a meeting among carriers and program administrators in which the mechanics of the system can be demonstrated and discussed. We believe that this approach will permit the industry to make more informed, focused comments and so yield an improved product. Sealift looks forward to working with you and your colleagues to achieve a suitable product.

Respectfully submitted,



Timothy B. Shea